

Alcan Aluminum Corporation



100 Erieview, Cleveland, Ohio 44114-1878
Mailing Address: P.O. Box 6977, Cleveland, Ohio 44101-1977. Telephone: 216/523-6800

Direct Dial No. (216) 523-2852

Direct Fax No. (216) 523-6999

November 14, 1995

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency - Region II
2890 Woodbridge Avenue
Edison, New Jersey 09937

Re: Bayonne Barrel & Drum Site (New Jersey)

Dear Mr. Cosentino:

Below is Alcan Aluminum Corporation's Response to the United States Environmental Protection Agency's Request for Information regarding the above-referenced Site.

- 1a & b Alcan Aluminum Corporation ("Alcan"). Alcan was the surviving entity of a merger between Alcan Aluminum Corporation, a New York corporation, and Alcan Properties, Inc. an Ohio corporation.
- c Robert L. Ball, President
100 Erieview Plaza, 29th Floor
Cleveland, Ohio 44114
The Board of Directors of Alcan does not have a chairman position.
- d See Attachment A, which is identified as Exhibit No. 21 to Form 10-K of Alcan Aluminium Limited. Due to the number of entries identified on Attachment A, further response to this request will be supplemented.
- e Alcan, f/d/b/a/Alcan Building Products, was purchased by Gentek Building Products, Inc. in 1994.
- f Not Applicable.
- 2a - b To our knowledge, Alcan has never transacted business with Bayonne barrel and drum.




- 3 Robert Fixter, Vice President-Compliance
S & W Waste, Inc.
115 Jacobies Avenue
South Kearing, New Jersey 07032
(201) 334-4004
- 4 Lawrence A. Salibra, Senior Counsel Alcan Aluminum Corporation.
Mr. Salibra was consulted on all of the questions.

William E. Vallier, Technical Manger.
Mr. Vallier was consulted on questions Nos. 1f, 2 b x and 7.

- 5 Alcan is insured through our parent Alcan Aluminium Limited, which is head quartered in Montreal, Canada. We are currently in litigation over the issue of coverage. No insurer has admitted coverage for CERCLA liability. In addition, for all policies at risk after 1972 a pollution exclusion clause was included for pollution that was not sudden and accidental.
- 6 Alcan is continuing to investigate sources for information responsive to this question. Due to the recent sale of Alcan Building Products to Gentek Building Products, Inc., records dating back to the time in question are not readily available.
- 7 See Attachment "B".

Very truly yours,



John D. Yeager
Corporate Litigation Administrator

JDY:wp
Enclosure
cc w/encl.:

Marc Sidenberg, Esquire
Office of Regional Counsel
U.S. EPA - Region II
290 Broadway, 17th Floor
New York, NY 10007

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

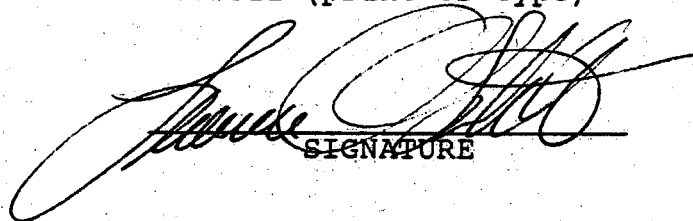
State of Ohio

County of Cuyahoga

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

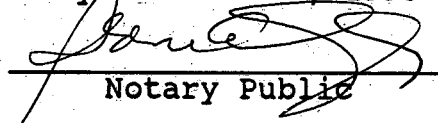
Lawrence A. Salibra
NAME (print or type)

Senior Counsel
TITLE (print or type)


SIGNATURE

Sworn to me before this 14th

day of NOV., 1995


Notary Public

IRENE ANN YAKOVLEVICH
Notary Public, State of Ohio
My Commission Expires Nov. 4, 1997
(Recorded in Cuyahoga County)

ATTACHMENT A

EXHIBIT NO. 21.: SUBSIDIARIES, RELATED COMPANIES, ETC.

With the exception of a number of subsidiaries which, considered in the aggregate, would not constitute a significant subsidiary, the subsidiaries of Alcan, as of December 31, 1994, are listed below. All subsidiaries and joint ventures named below are consolidated in the financial statements incorporated by reference in this report. The list also includes several related companies for which Alcan reports its interest in the net income or loss of such companies. Alcan is the direct owner of the stock of each subsidiary or related company, except where the name is indented. Indentation signifies that the principal ownership by Alcan is through the company under which the indentation is made; where there is additional ownership through another company also listed below, that additional ownership is described in the end-note on page 39.

<u>Subsidiary, Related Company, Etc.</u>	<u>Organized under the laws of</u>	<u>% of voting shares held by immediate owner</u>
Alcan Adminco Inc.	Canada	100
Alcan Aluminio (América Latina) Inc.	Canada	100
Alcan Aluminium Holdings Limited ♦ (see page 36)		
Alcan Aluminum Corporation	Ohio	100
Alcan Automotive Castings, Inc.	Ohio	100
Altek Automotive Castings Partnership	Delaware	50
Alcan Cable (Mexico), Inc.	Georgia	100
Alcan Management Services U.S.A. Inc.	Ohio	100
Alupower, Inc.	Delaware	100
Ampersand Corporate Spinoff Ventures Limited Partnership ...	Delaware	98.5
Erievue Cartage, Inc.	Ohio	100
Lanxide Corporation **	Delaware	23.8 (1)
Logan Aluminum, Inc.	Delaware	40
The Aluminum Railcar Company Partnership (TARCO)	Delaware	50
Alcan Finances (Barbados) Ltd.	Barbados	100
Alcan Finances (Bda) Ltd.	Bermuda	100
Alcan Aluminio del Uruguay S.A.	Uruguay	89.9
Alcan Asia Limited	Hong Kong	100
Alcan (Bermuda) Limited	Bermuda	100
Alcan Shipping (Bermuda) Limited	Bermuda	100
Alcan Nikkei China Limited	Hong Kong	49 (2)
Nonfemet International Aluminium Company Limited	China	45
Champlain Insurance Company Ltd.	Bermuda	100
Frialco S.A.	Cayman Islands	20
Friguia	Guinea	51
Halco (Mining) Inc.	Delaware	27
Compagnie des Bauxites de Guinée	Delaware	51
Alcan Finances B.V.	Netherlands	100
Alcan Finances (Ireland) Limited	Canada	100
Alcan Aluminium S.A.	Switzerland	100
Alcan Rorschach AG	Switzerland	100
Alcan Finances (Ireland) Company	Ireland	100
Alcan Iberica S.A.	Spain	80
Alcan International Limited	Canada	100
Alcan Investments Limited	Canada	100
Alcan Ireland Limited	Ireland	100
Aughinish Alumina Limited	Ireland	40 (3)
Aughinish Estates Limited	Ireland	40 (3)
Aughinish Property (Nominees) Limited	Ireland	40 (3)

<u>Subsidiary, Related Company, Etc.</u>	<u>Organized under the laws of</u>	<u>% of voting shares held by immediate owner</u>
<i>Alcan Aluminium Holdings Limited (continued)</i>		
<i>Alcan Europe S.A. (continued)</i>		
<i>British Alcan Aluminium plc (continued)</i>		
The Alumina Company Limited	England	100
Aluminium Corporation Limited	England	100
Aluminium Sulphate Limited	England	50
Aluminium Supply (Aerospace) Limited	England	100
Aylesford (Packaging) Limited	England	100
BA Chemicals Limited	England	100
BA Finance Limited	England	100
BA Metals Limited	England	100
Baco Aluminium Products Limited	England	100
Baco Contracts Limited	England	50 (11)
Belfast Aluminium Limited	Northern Ireland	100
Blackburns (London) Limited	England	100
British Alcan Conductor Limited	England	100
British Alcan Consumer Products Limited	England	100
British Alcan Extrusions Limited	England	50 (11)
British Alcan Highland Estates Limited	England	66.7 (12)
British Alcan Primary and Recycling Limited	England	100
British Alcan Rolled Products Limited	England	100
British Alcan Snappies Limited	England	100
British Alcan Wire and Conductor Limited	England	100
The British Aluminium Company Limited	England	100
Alcan Aluminium UK Limited	England	90 (13)
British Alcan Overseas Investments Limited	England	100
Alcan Metal Centres (Dublin) Limited	Ireland	100
Alcan Agency Sales Limited	Ireland	100
Magnesium Elektron Inc.	New Jersey	100
Nikkei-Mel Co., Ltd.	Japan	50 (4)
Saratoga Resources NV	Netherlands Antilles	20
Vigelands Metal Refinery A/S	Norway	50
Ghana Bauxite Company Limited	Ghana	45
Isleburn Limited	Scotland	21.7
Highland Fertilisers Limited	Scotland	96.2
MacKay & Macleod Engineering Limited	Scotland	100
Kinlochleven Road Transport Company Limited	Scotland	25
The Lochaber Power Company	Scotland	100
Venesta Foils Limited	England	100
Vigelands Brug A/S	Norway	100
British Aluminium Stockholders Limited	England	50 (11)
Four County Windows Limited	England	100
Gentrin Limited	England	100
Luxfer Holdings Limited	England	100
Luxfer USA Limited	Delaware	100
Superform USA Inc.	California	100
Luxfer UK Limited	England	100
Magnesium Elektron Limited	England	100
Pearhouse Limited	England	100

<u>Note</u>	<u>Additional Ownership Through</u>	<u>% of voting shares held</u>
(1)	Alcan Aluminium Limited	6.6
	Alcan Automotive Castings, Inc.	18.6
(2)	Nippon Light Metal Company, Ltd.	51
(3)	Alcan Shannon Company	25
(4)	Nippon Light Metal Company, Ltd.	50
(5)	Alcan Aluminium Limited	50
(6)	Alcan Aluminium Limited	47.4
(7)	Alcan Aluminium S.A.	1.5
(8)	British Alcan Aluminium plc.	30
	Alcan Alluminio S.p.A.	30
(9)	Alcan Aluminium Holdings Limited	8.9
(10)	Alcan Aluminium Limited	0.2
	Alcan Investments Limited	0.9
	Alcan Tokyo Investments Inc.	4.5
(11)	The British Aluminium Company Ltd.	50
(12)	The British Aluminium Company Ltd.	33.3
(13)	British Alcan Aluminium plc	10
(14)	Nippon Light Metal Company, Ltd., Japan's largest aluminum company, has its principal operations in Japan and has subsidiaries and related companies in many countries including Canada, China, Malaysia, Thailand, Indonesia and Brazil.	
(15)	Toyo Aluminium K.K., a major Japanese manufacturer of aluminum foil, paste and powder, has its principal operations in Japan and subsidiaries and related companies in the United States, France and Korea.	

ATTACHMENT B



October 31, 1995

NOV 13 1995

Mr. William Vallier
GENTEK
PO Box 459
Woodbridge, NJ 07095

Re: Bayonne Barrel & Drum

Dear Mr. Vallier:

In response to your October 27, 1995 letter to S & W concerning the above referred please accept the following explanation. S & W Waste, Inc. received a manifested (NJ0083924) shipment of waste from Alcan Aluminum Corp. on 11/28/81. One of the main processes at that time was for S & W to empty the drums by consolidating the waste into bulk loads for outbound shipments. These shipments were manifested off site to permitted facilities. S & W would then sell the RCRA empty drums to a drum reconditioner. Bayonne Barrel & Drum was a drum reconditioner that S & W sold it's empty drums to during this time period.

If you may have any questions concerning the above please call me at the below listed phone number at extension 272.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Fixter', is written over a horizontal line.

Robert Fixter
V.P. of Compliance

115 Jacobus Avenue South Kearny, New Jersey 07032
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ADM. FAX- 201-344-1265 • SALES FAX-201-344-8652



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